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Attorneys for Defendant

AMERICAN NATIONAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DAPHNE P. RAND, by and through DEBRA J.
DOLCH, as Conservator of the Person and Estate
of DAPHNE P. RAND, Conservatee, on Behalf of
Themselves and All Others Similarly Situated,

Plaintiff,

v.

AMERICAN NATIONAL INSURANCE
COMPANY, a Texas corporation,

Defendant.

Case No.: CV09-0639 WDB

**STIPULATION REGARDING DATE
TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT; AND [PROPOSED]
ORDER**

[Local Rule 6-1]

Courtroom : 4
Honorable Wayne D. Brazil

Filed : 02/12/09

IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1, by and between plaintiff
Daphne Rand, by and through Debra J. Dolch, as Conservator of the Person and Estate of Daphne
P. Rand, Conservatee, on Behalf of Themselves and All Others Similarly Situated ("Plaintiff") and
defendant American National Insurance Company ("Defendant"), through their attorneys of record,
as follows:

1. On or about February 13, 2009, defendant American National Insurance Company
received a Notice of Lawsuit and Request For Waiver of Service of Summons regarding this action,
along with a copy of the Summons and Complaint;

- 1 2. Defendant has agreed to waive service of the Summons and Complaint in this action;
- 2 3. The parties have agreed that defendant's response to the Complaint shall be due on
- 3 or before March 27, 2009; and
- 4 4. This stipulated date for Defendant to respond to the Complaint will not alter the date
- 5 of any event or any deadline already fixed by Court order.

6

7 Date: March 6, 2009

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

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9 By: /s/ Thomas M. Herlihy

10 THOMAS M. HERLIHY

11 Attorneys for Defendant

12 AMERICAN NATIONAL INSURANCE
COMPANY

13 Date: March 6, 2009

BONNETT, FAIRBOURN, FRIEDMAN &
BALINT, P.C.

14

15 By: /s/ Andrew S. Friedman

16 ANDREW S. FRIEDMAN

17 Attorneys for Plaintiff

18 DAPHNE P. RAND

19 **ORDER**

20 **IT IS SO ORDERED.**

21

22 Date: 3/9/2009

By: _____

